

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA

\*

VS

\*

CRIMINAL NO. B-14-876-01

**KEVIN LYNDEL MASSEY**

\*

**GOVERNMENT'S NOTICE OF INTENT TO OFFER EXPERT WITNESS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States Attorney for the Southern District of Texas, by and through the undersigned Assistant United States Attorney, and files this notice. The Government intends to rely on expert testimony at trial and is providing the following notice pursuant to Rule 16(a)(1)(G).

I

The defendant, **KEVIN LYNDEL MASSEY**, has been charged with Four Counts of Felon in Possession of a Firearm. His trial on the merits is set for Jury Selection on June 4, 2015. The Government intends to call Eduardo Ramirez as an expert witness in the field of firearms tracing, classification and analysis.

II

Eduardo Ramirez is currently employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) as a Special Agent in the Brownsville Field Office. He attended training at the National Tracing Center in West Virginia in 2012 and has continued access to publications, experts, and peer support groups in order to conduct his analysis.

III

In preparation for his testimony, Special Agent Eduardo Ramirez will review and research each firearm involved in this case, namely: (i) Springfield .45 caliber pistol S/N XS664509 contained in Count 1; (ii) C.A.I., Model Centurion 39 Sporter, S/N 39NC02585 contained in Count 2; (iii) Springfield .45 caliber pistol S/N XS613495 contained in Count 3; (iv) Springfield .45 Caliber pistol S/N US777533 contained in Count 4; and (v) Zastava, Model PAP S/N MP2PV005143. In addition to photograph examination, these firearms were researched by referencing the Bureau of Alcohol, Tobacco, Firearms and Explosives list of firearms and ammunition manufacturers and other industry related reference material which is widely known and used by both law enforcement and civilian firearms experts to obtain information about firearms and their respective manufacturers, including firearms place of manufacture and other matters of interest related to firearms.

Respectfully submitted,

KEN MAGIDSON  
UNITED STATES ATTORNEY

**s/ William Hagen**  
WILLIAM HAGEN  
Assistant United States Attorney  
Federal Bar #: 28261  
State Bar #: 08688600  
600 E. Harrison, #201  
Brownsville, Texas 78520  
(956) 548-2554 - Tel: (956) 548-2711 - Fax

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 26th day of May, 2015, a copy of Government's Notice of Intent to Offer Expert Witness was provided to defense counsel Louis Sorola.

*s/ William Hagen*

WILLIAM HAGEN

ASSISTANT UNITED STATES ATTORNEY